

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

Mary F Patwin

CHAPTER 13  
CASE NO. 20-43967-MAR  
JUDGE MARK A RANDON

Debtor

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**TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN**

**Now Comes** the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Where the State of Michigan has filed a notice of unfiled returns, Trustee objects to confirmation pursuant to 11 U.S.C. § 1325(a)(9) and 11 U.S.C. § 1308. Trustee requests copies of debtor's 2016, 2017 and 2018 returns.
2. Trustee objects to debtor's failure to list Wayne County Friend of Court on Schedule E and the Chapter 13 mailing matrix.
3. Pursuant to debtor's testimony at the § 341 First Meeting of Creditors, Trustee requests that debtor comply with F.R.Bankr.P. 4002(a)(5) to disclose her new address.
4. The Trustee objects to the failure to provide for complete information for all creditors listed in the Schedules on the Matrix and believes that creditors may not have been adequately advised of the pendency of these proceedings.
5. Trustee requests 100% of the profit sharing/bonus checks in excess of the prorated amount on Schedule I to which debtor becomes entitled.

**Wherefore**, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

Dated: July 01, 2020

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT  
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARGARET CONTI SCHMIDT

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**CERTIFICATE OF MAILING**

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

FREGO AND ASSOCIATES  
23843 JOY ROAD  
DEARBORN HEIGHTS, MI 48127

July 01, 2020

/s/ Barb Ecclestone

BARB ECCLESTONE

For the Office of the Chapter 13 Trustee-Detroit  
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Detroit, MI 48226  
(313) 962-5035  
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